1	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI
2	ABERDEEN DIVISION
3	ROBBIE KEETON GEIGER, as Administratrix
4	Of the Estate of Ricky Keith Keeton, Deceased; DELISHA KEETON MOONEY, and
5	MEGAN ARCHER PLAINTIFFS
6	VS. CAUSE NO. 1:16-CV95-SA-DAS
7	MONROE COUNTY, MISSISSIPPI and ERIC SLOAN DEFENDANTS
8	
9	
10	**************
L1	DEPOSITION OF WANDA STEGALL
12	
13	**************
L4	
15	
16	
L7	TAKEN AT THE INSTANCE OF THE DEFENDANTS
18	AT THE LAW OFFICES OF WAIDE & ASSOCIATES, 332 NORTH SPRING STREET, TUPELO, MISSISSIPPI
19	ON MARCH 1, 2022, BEGINNING AT 12:57 P.M.
20	
21	
22	
23	GENA MATTISON GLENN, CSR 1568
2.4	Glenn-Henry Reporting Post Office Box 492
24	Amory, Mississippi 38821-0492
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	EXHIBIT L3

1	APPEARANCES:
2	WAIDE & ASSOCIATES P.O. Box 1357
3	Tupelo, MS 38802-1357 For the Plaintiffs
4	BY: JIM D. WAIDE
5	JACKS GRIFFITH LUCIANO P.O. Drawer 1209
6	Cleveland, MS 38732-1209 For the Defendants
7	BY: JAMIE F. LEE ARNOLD U. LUCIANO
8	THENOLD OF HOUTING
9	ALSO PRESENT: MS. ROBBIE KEETON GEIGER
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	Reported by: GENA MATTISON GLENN, CSR 1568 GLENN-HENRY REPORTING

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	1	WANDA STEGALL,
	2	being first duly sworn, was examined
	3	and testified under oath as follows:
	4	
	5	EXAMINATION
	6	BY MS. LEE:
	7	Q. Ms. Wanda, my name is Jamie Lee. I'm
	8	one of the attorneys in this case. And we
	9	introduced ourselves to each other a few moments
12:57:27	10	ago.
	11	This is a continuation of a deposition
	12	that was started a few years ago in a case
	13	involving Mr. Keeton, who I understand to be an
	14	acquaintance or friend and we'll get into
	15	that of yours.
	16	You are here today under subpoena,
	17	correct?
	18	A. Yeah.
	19	Q. And you have to answer yes or no
12:57:45	20	A. Oh, okay.
	21	Q out loud
	22	A. Yes.
	23	Q so our court reporter can take it
	24	down.
	25	A. Okay.

```
1
                     Ο.
                          If I ask you a question that is
               confusing in any way, please let me know; and
       2
        3
               I'll stop that question, start over, rephrase
               the question to something you understand.
        4
        5
               Agreed?
        6
                     Α.
                         I agree.
                          Okay. And as we sit here today, are
       7
       8
               you under any kind of influence of any
               medication or any drug whatsoever that would
       9
               affect your ability --
       10
12:58:07
       11
                     Α.
                          No.
                          -- to give truthful testimony --
       12
                          No.
       13
                     Α.
       14
                     Q.
                          -- today?
       15
                     Α.
                          No.
                          Or understand questions?
       16
                     Q.
                          I understand questions.
       17
                     Α.
       18
                     Q.
                         Okay.
       19
                     Α.
                         Today.
                         Very good.
       20
                     Q.
12:58:17
       21
                          Wanda, because we've had a few years
               between the beginning of the deposition and
       22
               today, can you just update us and let us know
       23
               what your current address is?
       24
       25
                          60287 Weaver Creek Road, Amory.
                     Α.
```

	1	Q. And how long have you lived at that
	2	address?
	3	A. Just about all my life.
	4	Q. Was there a time that you lived with
	5	Mr. Ricky Keeton?
	6	A. Yes.
	7	Q. And what period of time was that?
	8	A. I don't even know. Do you know what
	9	year?
12:58:48	10	MS. GEIGER: 2004 up until he died in
	11	2015.
	12	BY MS. LEE:
	13	Q. Okay. So one of Mr. Keeton's
	14	daughters is in the room, and she has stated
	15	that the approximate time you lived with him was
	16	2004 to 2015.
	17	A. Yes.
	18	Q. Correct?
	19	A. Yes.
12:58:59	20	Q. And you agree with that.
	21	A. Yes.
	22	Q. And would you consider your how
	23	would you have defined your relationship with
	24	Mr. Keeton in terms of were you friends,
	25	romantic

	1	A. Both.
	2	Q. Okay.
	3	A. Both.
	4	Q. And was that true for the entirety of
	5	the 2004 to 2015?
	6	A. Yes.
	7	Q. And when you said that you lived with
	8	him during that time, did you keep a residence
	9	elsewhere, or was that your essentially your
12:59:25	10	residence?
	11	A. No, I had a my house.
	12	Q. Which is the address you first gave
	13	me?
	14	A. Yes. Yes.
	15	Q. All right. Would you spend the night
	16	with Mr. Keeton most nights, though, during that
	17	11-year period?
	18	A. Most of the time I did.
	19	Q. Okay.
12:59:37	20	A. And then I stayed home with my sister.
	21	Q. But most nights with Mr. Keeton?
	22	A. Yeah.
	23	Q. Where are you employed, Wanda, today?
	24	A. Alan White in Okolona.
	25	Q. Alan White?

	1	A. Uh-huh.
	2	Q. And what type of business is that?
	3	A. It's furniture.
	4	Q. How long have you been employed at
	5	Alan White's?
	6	A. About three years, four years.
	7	Q. And where were you employed before
	8	that time?
	9	A. J Henry in Okolona.
13:00:04	10	Q. Is that also a furniture store?
	11	A. Yeah.
	12	Q. Furniture manufacturer?
	13	A. Yeah.
	14	Q. And what is your position at the
	15	current job that you have?
	16	A. Inspecting.
	17	Q. And what was your previous position
	18	A. Inspecting.
	19	Q at J Henry?
13:00:18	20	A. Inspecting.
	21	Q. Okay. Wanda, are you familiar with
	22	Mr. Keeton's daughters, who are the
	23	plaintiffs
	24	A. Yes.
	25	Q in a lawsuit we're here about

```
1
               today? And let me finish -- you're anticipating
       2
               my question, which is very natural. But if
        3
               you'll let me finish the question --
        4
                    Α.
                         Okay.
       5
                         -- just so that our court reporter can
       6
               get a clean record, it will help her as well.
       7
                    Α.
                         Okay.
                         So I'll ask again. You are familiar
       8
               with Mr. Keeton's daughters?
       9
                    Α.
                         Yes.
13:00:47
      10
                         Correct? And what are their names?
      11
                    Ο.
      12
                         Robbie, Delisha, and Megan.
      13
                         Okay. When you were living with
               Mr. Keeton in that 11-year period, did you see
      14
      15
               his daughters from time to time?
      16
                    Α.
                         Yes.
      17
                         Okay. And how often would the
               daughters visit their father there at the --
      18
               Mr. Keeton's residence?
      19
      20
                         Robbie was -- when she was living
13:01:05
               here, she come pretty regular. And Delisha
      21
      22
               would come pretty good, a couple of times a
               month. And Megan, we didn't see her much
      23
               because she lived in Louisiana.
      24
      25
                         And Robbie, when you said when she
```

```
1
               lived here, where has Robbie lived?
       2
                         Colorado.
                     Α.
                         And when did she move to Colorado?
        3
                         I don't know that.
        4
        5
                     Q.
                         Okay. During the period that you were
        6
               living with Mr. Keeton was Robbie in Colorado
       7
               for the --
                     Α.
                         Yes.
       8
       9
                         -- majority of the time?
13:01:38
      10
                     Α.
                         Yes.
                         So during that period would she -- I'm
       11
                     Q.
       12
               assuming she would not visit her father as
       13
               regularly as a person who would live in town,
               correct?
      14
       15
                     Α.
                         Yeah.
                         Did you ever witness Mr. Keeton
       16
       17
               visiting on the phone with his daughters?
       18
                     Α.
                         Yes.
       19
                         Okay. And how often would that be?
                     Q.
                         Pretty often.
      20
                     Α.
13:01:55
       21
                         And can you quantify that in terms of
       22
               times a week?
       23
                         Well, I don't really know exactly
                     Α.
               because he talked to her during the day and I
       24
       25
               was at work.
```

	1	Q. Okay. Speaking of work, what was
	2	Mr. Keeton's occupation? How did he make money?
	3	A. Just a little bit of everything. He
	4	worked on cars. Just anything that he could
	5	work on and fix for somebody else.
	6	Q. Okay. So the majority of his what
	7	we'll call his income was done from repairing
	8	cars?
	9	A. Yes.
13:02:26	10	Q. And were those cars
	11	A. And
	12	Q at the house?
	13	MR. WAIDE: Excuse me. Let her finish
	14	her answer.
	15	MS. LEE: I'm sorry.
	16	A. And he he worked in furniture for a
	17	while.
	18	BY MS. LEE:
	19	Q. Okay. How much money would he make
13:02:36	20	working on cars?
	21	A. I don't know.
	22	Q. All right. Did you-all share
	23	finances?
	24	A. Most of the time.
	25	Q. And how would that work between you

1 two? 2 Α. What do you mean? Well, in other words, how -- did you 3 have a joint bank account? 4 A. Yes, we did, but he had his own bank 5 account, and we had one together. 6 Q. Okay. And the cars that Mr. Keeton 7 would work on, were those the cars in the front 8 9 of the trailer? Α. Yes. 10 13:03:01 Okay. So all those cars were other 11 people's cars, correct? 12 Some of them were and some of them 13 Α. 14 wasn't. Whose cars were they if they weren't 15 other people's cars? 16 Well, I don't know. That's -- my 17 sister, she would be up there sometime. My 18 brother would be up there sometime. Just 19 20 different people. 13:03:17 21 Q. I see. A. I mean, it's -- they wasn't -- he 2.2 wasn't working on those. It was just cars that 23 24 was there. 25 Q. That were visiting.

	1	A. Yeah.
	2	Q. Okay. But the cars that were
	3	essentially parked in the front yard, those were
	4	cars Mr. Keeton was working on for other people?
	5	A. Yeah, but there wasn't but one or two
	6	there.
	7	Q. All right. And other people were just
	8	visiting cars?
	9	A. Yeah.
13:03:39	10	Q. All right. You testified earlier that
	11	some of the property that the police took the
	12	night that they served the warrant was property
	13	that actually you owned, correct?
	14	A. Part of it was.
	15	Q. Can you identify that property?
	16	A. My car.
	17	Q. Okay. Anything else?
	18	A. Yeah. Ricky's well, it was my
	19	phone. They took my phone. I don't know what
13:04:06	20	all some tools
	21	Q. Uh-huh.
	22	A that we had in the bedroom that I
	23	had bought for Christmas.
	24	Q. Okay.
	25	A. And I don't know what all.

```
Okay. Wanda, did Mr. Keeton also make
       1
                     Q.
       2
               money by selling drugs?
        3
                         I don't know that. I don't have a
        4
               clue.
        5
                     Q.
                         Okay.
                         I didn't see him.
        6
                     Α.
       7
                         You didn't see him exchange money --
                     Q.
       8
                     Α.
                         No.
       9
                         -- with other persons for drugs?
                     Q.
      10
                     Α.
                         No.
13:04:34
                         All right. Did Mr. Keeton keep drugs
      11
                     Q.
               at the trailer while you lived with him in that
       12
               11-year period?
       13
                         Not in the trailer.
       14
      15
                         Where were they kept?
                         If he kept anything, it was in a green
       16
       17
                     I didn't know what was in there. I mean,
               I didn't have a clue until that night.
       18
       19
                         And was this the green ammo can as
13:04:52
      20
               it's --
       21
                     Α.
                         Yes.
                          -- come to be known?
       22
                     Ο.
                         That was his -- his in his possession.
       23
                     Α.
                         Okay.
       24
                     0.
                         And I never did look into it. Never
       25
```

```
1
               did get -- open it up or nothing.
       2
                     Q. All right. On the night in question,
               which was October 27th and then 28th -- I
       3
               believe the warrant was served in the early
       4
       5
               morning hours of the 28th -- did you know at
               that time that there was crystal meth inside the
       6
       7
               ammo can?
                    Α.
                         No.
       8
                         Okay. Did you direct the police,
       9
               though, didn't you, to the ammo can to see where
      10
13:05:19
      11
               the drugs were?
                        I told them that if he had anything,
      12
               it would be in the can:
      13
      14
                     Q.
                        Okay.
                         And that's what I told them.
      15
                     Α.
                         And, in fact, there was crystal meth
      16
               inside the can?
      17
                         MR. WAIDE: Excuse me. Object --
      18
      19
                         I don't know what was in there.
                     Α.
                         MR. WAIDE: She wouldn't have any way
      20
13:05:33
                     of knowing that.
      21
      22
                         I have no clue:
               BY MS. LEE:
      23
                        Okay. Did you actually witness the
      24
      25
               police open the ammo can?
```

	1	A. No.
	2	Q. Okay.
	3	A. I was not there.
	4	Q. All right. On the night of the 27th,
	5	October 27, 2015, did Mr. Keeton smoke or ingest
	6	crystal meth prior to the police arriving?
	7	A. Yes.
	8	Q. Okay. Approximately what time was
	9	that?
13:05:59	10	A. About probably about 8:00 o'clock.
	11	Q. All right. Do you know how much meth
	12	he smoked that night?
	13	A. Just a little bit. I mean
	14	Q. What's a little bit?
	15	A. I don't know. It was just a little
	16	bit. I don't know how I don't know how to
	17	tell you.
	18	Q. Okay. And how did he how did he
	19	smoke it? Was it
13:06:26	20	A. In a pipe.
	21	Q. Did you-all have pipes inside the
	22	house, crystal meth pipes?
	23	A. No. We did that night; but other than
	24	that, we didn't.
	25	Q. So you just had a crystal meth pipe

```
1
               there that night.
        2
                     Α.
                          Yes.
                          Where did that pipe come from?
        3
                     Q.
                          I don't have a clue.
                     Α.
        4
        5
                     Q.
                          It just appeared that night?
                          I don't -- yeah. I don't know because
        6
                     Α.
        7
               I don't buy them.
                          Okay. You smoked crystal meth with
        8
        9
               Mr. Keeton --
       10
                     Α.
                          Yes.
13:06:47
                          -- that night?
       11
                     Q.
       12
                     Α.
                          Yes.
                          You did. And how much did you smoke?
       13
                     Q.
                     Α.
                          A little bit.
       14
                          Is that --
                     Ο.
       15
                          Probably less than a half a gram.
       16
                     Α.
                          Did Mr. Keeton tell you where he'd
       17
                     0.
               gotten the crystal -- well, let me ask you a
       18
               better question. Who obtained the crystal meth
       19
               that you smoked that night?
13:07:09
      20
                         I don't have a clue.
       21
                          Did you buy it from someone?
       22
                     Q.
                          No. I -- no. I did not.
       23
                     Α.
                          Do you know if Mr. Keeton bought it
       24
       25
               from someone?
```

```
1
                          I don't know that.
                     Α.
        2
                          He just produced the crystal meth:
        3
                     Α.
                          Yes.
                          And you smoked it that night.
        4
                     0.
        5
                     Α.
                          Yes.
        6
                          The night the police came.
                     Q.
        7
                     Α.
                          Yes.
        8
                          About 8:00 at night.
                     Q.
        9
                     Α.
                         Yes.
                          All right. After you smoked crystal
       10
13:07:28
               meth, what did you do next?
       11
       12
                          Watched TV for a little while, and
                     Α.
               then we went to bed about 10:00 o'clock.
       13
       14
                     Q.
                          All right. You both went to bed --
                     Α.
                          Yes.
       15
                          -- at 10:00 o'clock.
       16
                     0.
       17
                     Α.
                          Yes.
                          Mr. Keeton, did he get into his
       18
                     Q.
               pajamas to get into bed?
       19
                        I don't even -- I don't remember.
       20
13:07:54
       21
                          Okay. Did you get into your pajamas
       22
               or --
                          I don't know.
       23
                          -- change clothes?
       24
                     Q.
                          I don't have a clue.
       25
                     Α.
```

	1	Q. Were you high at the time you got into
	2	bed?
	3	A. No, not really, I don't guess, because
	4	we went to sleep.
	5	Q. Okay. So you smoked a little crystal
	6	meth and then went to sleep?
	7	A. Yeah.
	8	Q. How often during that period of your
	9	life, Wanda, were you smoking crystal meth?
13:08:15	10	A. In my life?
	11	Q. During that time period in 2015.
	12	A. Just maybe a couple of times a week.
	13	Q. Did you and Mr. Keeton well, let me
	14	ask: Did you do any other drugs besides crystal
	15	meth during that period?
	16	A. I smoked some pot.
	17	Q. And who
	18	MR. WAIDE: Excuse me for
	19	interrupting. Excuse me. Would Counsel
13:08:41	20	restate what you mean by "that time
	21	period"?
	22	THE WITNESS: Yeah.
	23	MR. WAIDE: Are you talking about that
	24	night or during the time they lived
	25	together? What are you talking about?

	1	BY MS. LEE:
	2	Q. Let's talk about the time period that
	3	you lived together.
	4	A. Yeah, I I smoked some pot when I
	5	found out I had cancer.
	6	Q. Okay. And when did you find out you
	7	had cancer?
	8	A. I don't even know what year it was. I
	9	don't even know. I don't remember what year it
13:09:05	10	was.
	11	Q. Okay.
	12	MS. GEIGER: 2006 or '7.
	13	A. Yeah. It was something like that.
	14	MR. WAIDE: Excuse me. I didn't
	15	understand what Robbie said.
	16	MS. GEIGER: 2006 or '7.
	17	BY MS. LEE:
	18	Q. Okay. But in 2015 you and Mr. Keeton
	19	were smoking crystal meth several times a week?
13:09:21	20	A. Couple of times a week. Not several;
	21	couple.
	22	Q. All right. And by "a couple"
	23	A. I mean, like, two times a week.
	24	Q. Two times a week. But it's your
	25	testimony that you don't know where this crystal

```
1
               meth was coming from?
       2
                         No, I did not.
                     Α.
                         And each time you smoked it -- you
       3
               said you smoked it a little bit on the night of
       4
       5
               October 27, 2015. Were there times that you
               smoked a lot of it?
       6
       7
                     Α.
                         No.
                         All right. Every time it was just,
       8
                     0.
       9
               quote, a little of it?
                         Yeah, just a little bit.
13:09:44
      10
                         And you're defining "a little bit" as
      11
               a half a gram of crystal meth?
      12
                        Less than a half a gram.
      13
                     Α.
      14
                        Less than a half a gram of crystal
      15
               meth.
                         Wanda, you were convicted of a drug
      16
               charge following the October 27-28, 2015,
      17
      18
               incident, correct?
                     A. 2000 what? 15?
      19
                         Yes, ma'am
      20
                     Q.
13:10:15
      21
                         Yeah, then. After they shot him --
                     Α.
                         I understand, but --
      22
                     Q.
                         -- I was charged.
      23
                     Α.
                         You were charged. And what were you
      24
                     Q.
      25
               charged with?
```

```
1
                    Α.
                         Possession.
                         Of more than 10 grams of crystal
                    Q.
       3
               meth --
       4
                         Well, no.
                    Α.
       5
                         -- but less than 30?
                             It was 9 -- 9 ounces is what it
       6
                    Α.
       7
                     I think that's what it was.
                         MR. WAIDE: Excuse me. Excuse me. I
       8
                    think she's referring to the -- I don't
       9
                    think y'all are talking about the same
13:10:36
      10
                    thing. I think you're answering about how
      11
      12
                    much was found, and I think she's asking
      13
                    about how much you --
                         Would you state the question again?
      14
      15
                         MS. LEE: Sure.
                         MR. WAIDE: I think y'all are talking
      16
                    about two different things.
      17
               BY MS. LEE:
      18
                         Wanda, let's start with this: How
      19
               many times have you been convicted of a drug
      20
13:10:49
               offense?
      21
      22
                    Α.
                        One time before.
      23
                    0.
                         And when was that?
                         2000 -- I don't know. 2004, 2005. I
      24
               don't know. Don't remember.
      25
```

	1	Q. And what was that offense?
	2	A. Possession.
	3	Q. And possession of what type of drug?
	4	A. Crystal meth.
	5	Q. And did you serve any time?
	6	A. No. On probation five years.
	7	Q. So in 2004 you were on probation for a
	8	five-year period, bringing us to 2009.
	9	Following following that 2004 probation for
13:11:28	10	the crystal meth charge, were you ever convicted
	11	of any other drug offenses?
	12	A. No. No.
	13	Q. All right. Weren't you charged with a
	14	drug offense arising out of the Mr. Keeton
	15	incident and the drugs found on the property?
	16	A. Yes.
	17	Q. All right. Tell me the outcome of
	18	that drug charge.
	19	A. Probation.
13:11:53	20	Q. Did you plead guilty to possession at
	21	that time?
	22	A. I pled guilty but not to the charge.
	23	Q. What did you plead guilty to?
	24	A. That was
	25	MR. WAIDE: You don't have to look at

```
I think -- I think I know, but I don't
       1
                    know really -- as I --
                         Well, I -- I really don't know.
       3
                         MR. WAIDE: As I understand it, she
       4
                    was charged -- here's what I understand
       5
                    from the records. She was charged with --
       6
                         THE WITNESS: Drug trafficking.
       7
                         MR. WAIDE: -- drug trafficking and
       8
                    convicted of possession.
       9
                         MS. LEE: All right. That's what I
13:12:17
      10
                    understand as well.
      11
      12
                    A. Yeah.
      13
              BY MS. LEE:
      14
                    Q. So you pled guilty to possession of
      15
               crystal meth again --
                    A. Yeah.
      16
                    Q. -- arising out of the 2015 incident?
      17
                        I guess I did.
      18
                    Α.
                         Okay. And what was the result of that
      19
              plea?
      20
13:12:29
                    A. Probation.
      21
      22
                        All right. What were the terms of
      23
               your probation?
      24
                    A. What do you mean?
                    Q. What did you have to do to make sure
      25
```

```
1
               you fulfilled the obligations of your -- of your
       2
               sentencing?
                    A. I had to keep a job and just quit
       3
               doing drugs. That's about it.
       4
       5
                        Did you have to submit to regular drug
               testing?
       6
       7
                    Α.
                         Sometimes I did.
       8
                    Q. All right. And do you remember when
               you entered that plea agreement?
       9
                    Α.
      10
                         No.
13:12:57
      11
                         Wanda, have you taken drugs since
                    Ο.
      12
               2015?
      13
                    Α.
                         No.
      14
                         Nothing.
                    Q.
      15
                    Α.
                         No.
      16
                    Q.
                         No pot?
      17
                    Α.
                         No pot.
                         And no crystal meth.
      18
                    Q.
      19
                    Α.
                         No.
                         All right. Do you attend meetings
      20
                    Q.
13:13:08
               regularly for --
      21
                         No. I did for a while and went to
      22
                    Α.
      23
               therapy, but I just quit going.
      24
                    Q.
                        When did you stop going to the -- and
               when I say "meetings," I'm referring to AA
      25
```

	1	meetings or NA meetings.
	2	A. No, I went to them back in, like,
	3	2005 I went to meetings, and then I quit.
	4	Q. Okay. And following the incident of
	5	October 27-28th, 2015, did you move back
	6	permanently to the house that you first told me
	7	about in Amory that's your house?
	8	A. Yes. Yes.
	9	Q. And you live there currently.
13:13:47	10	A. Yes.
	11	Q. And who do you live with there?
	12	A. My sister.
	13	Q. Okay. Taking this back to October 27,
	14	2015, on that evening you smoked meth at 8:00
	15	o'clock, you said.
	16	A. About 8:00 o'clock.
	17	Q. Were there any visitors at the trailer
	18	that night? And let's begin by early afternoon,
	19	say from 4:00 p.m. to the time you went to
13:14:17	20	sleep. Any visitors that came to the trailer
	21	that you remember?
	22	A. Yes.
	23	Q. And who were they?
	24	A. Terry Parker.
	25	Q. And did you know Terry Parker prior to

1 that night? 2 Did I what? 3 Know him prior to that night? Q. 4 I knew of him. Α. 5 Q. Okay. 6 Α. He'd been out to the trailer working on some stuff for Ricky. 7 Did Mr. Parker come to the trailer to 8 buy drugs from Ricky? 9 I don't know that. 13:14:38 10 Wanda, how much money did Mr. Keeton 11 make from the working on the cars and the other 12 13 lines of business you told me he was engaged in 14 at the trailer? I don't know. 15 Α. 16 Okay. How did he pay his bills? 0. I don't know. I paid most of them. 17 Α. 18 0. Okay. 19 It took my check to pay most of them. And if he had any money, he would put it with --20 13:15:02 21 you know, with mine, and that's how we paid stuff. 22 Okay. Mr. Parker. What time did he 23 Q. come by the trailer on the night of October 27, 24 2015? 25

	1	A. I don't know. I don't remember what
	2	time it was.
	3	Q. Did he also smoke meth with you that
	4	night?
	5	A. He didn't. Did he did not, not with
	6	me. I don't know that he did with Ricky.
	7	Q. Tell me about the cameras that
	8	Mr. Keeton had surrounding the trailer. I want
	9	to ask you a few question about those. How many
13:15:33	10	did you-all have?
	11	A. I don't know. About three, four. I
	12	don't know.
	13	Q. All right. There was a camera at the
	14	cattle gate, wasn't there?
	15	A. Yeah. I think so.
	16	Q. Was that so Mr. Keeton could see who
	17	was coming and going from the property?
	18	A. Yeah, because he'd had some vehicles
	19	stole out of the yard.
13:15:50	20	Q. Vehicle other people that had
	21	brought their vehicles for Mr. Keeton to work
	22	on?
	23	A. No. That was just some that he had.
	24	Q. Okay. Where were the other cameras
	25	located at the property?

2 toward the creek, I think. Q. All right. When you say "out back," 4 was that a camera pointed at the back door of 5 the trailer? A. Yes. Q. And then you said there was a third 8 camera? A. I think it was out by the creek. Q. And where was that camera pointed, if 11 you know? A. It would be pointed, like, across the 13 creek toward the gravel place. Q. Okay. The camera that was pointed at the back door, was that camera sending in a live	1	A. One out back. And I'm not one out
was that a camera pointed at the back door of the trailer? A. Yes. Q. And then you said there was a third camera? A. I think it was out by the creek. Q. And where was that camera pointed, if tyou know? A. It would be pointed, like, across the creek toward the gravel place. Q. Okay. The camera that was pointed at	2	toward the creek, I think.
the trailer? A. Yes. Q. And then you said there was a third 8 camera? A. I think it was out by the creek. Q. And where was that camera pointed, if 11 you know? A. It would be pointed, like, across the 13 creek toward the gravel place. Q. Okay. The camera that was pointed at	3	Q. All right. When you say "out back,"
A. Yes. Q. And then you said there was a third 8 camera? 9 A. I think it was out by the creek. Q. And where was that camera pointed, if 11 you know? 12 A. It would be pointed, like, across the 13 creek toward the gravel place. Q. Okay. The camera that was pointed at	4	was that a camera pointed at the back door of
Q. And then you said there was a third 8 camera? 9 A. I think it was out by the creek. Q. And where was that camera pointed, if 11 you know? 12 A. It would be pointed, like, across the 13 creek toward the gravel place. Q. Okay. The camera that was pointed at	5	the trailer?
A. I think it was out by the creek. Q. And where was that camera pointed, if you know? A. It would be pointed, like, across the creek toward the gravel place. Q. Okay. The camera that was pointed at	6	A. Yes.
A. I think it was out by the creek. Q. And where was that camera pointed, if you know? A. It would be pointed, like, across the creek toward the gravel place. Q. Okay. The camera that was pointed at	7	Q. And then you said there was a third
Q. And where was that camera pointed, if you know? A. It would be pointed, like, across the creek toward the gravel place. Q. Okay. The camera that was pointed at	8	camera?
11 you know? 12 A. It would be pointed, like, across the 13 creek toward the gravel place. 14 Q. Okay. The camera that was pointed at	9	A. I think it was out by the creek.
A. It would be pointed, like, across the creek toward the gravel place. Q. Okay. The camera that was pointed at	13:16:18 10	Q. And where was that camera pointed, if
creek toward the gravel place. Q. Okay. The camera that was pointed at	11	you know?
14 Q. Okay. The camera that was pointed at	12	A. It would be pointed, like, across the
	13	creek toward the gravel place.
the back door, was that camera sending in a live	14	Q. Okay. The camera that was pointed at
	15	the back door, was that camera sending in a live
16 feed inside the trailer?	16	feed inside the trailer?
17 A. What do you mean?	17	A. What do you mean?
18 Q. Could Mr. Keeton, at any time, look up	18	Q. Could Mr. Keeton, at any time, look up
19 to a monitor and see who was approaching from	19	to a monitor and see who was approaching from
13:16:48 20 the back door?	13:16:48 20	the back door?
21 A. If it was in daytime.	21	A. If it was in daytime.
Q. Okay. What about nighttime?	22	Q. Okay. What about nighttime?
A. No, not unless it was lit up.	23	A. No, not unless it was lit up.
Q. How do you know that?	24	Q. How do you know that?
25 A. Well, because I I was watching it	25	A. Well, because I I was watching it

```
1
               sometime.
       2
                    Q. I see.
                         And you can't see anybody in the dark
       3
       4
               unless it -- the light comes on.
       5
                         Okay. Did you-all have a light --
                    Q.
                         No.
       6
                    Α.
       7
                     0.
                         -- at the back door?
       8
                    Α.
                         No.
                         Okay. The volume, though, was turned
       9
                    Q.
               up, wasn't it, on that camera?
13:17:10
      10
                        I don't know if it was or not.
      11
      12
                    0.
                         Okay.
                         I don't -- I don't remember hearing
      13
                    Α.
      14
               nothing.
      15
                    Q.
                        Okay. But you were -- you were asleep
               when the --
      16
                    A. Yeah.
      17
                         -- police arrived.
      18
                         Now, the camera at the cattle gate,
      19
               was that also a live feed camera, or did that
      20
13:17:25
               take pictures?
      21
      22
                    A. I don't know.
      23
                     Q.
                        Okay.
      24
                    Α.
                         I don't remember.
                     Q. All right. And the camera at the
      25
```

```
1
               creek, do you know if that was a live feed or
       2
               picture-taking camera?
                         No. It was -- he just put that out
       3
               there because of the people that worked at the
       4
       5
               gravel place.
                    Q. And why did he put that out there
       6
       7
               because of the people that worked at the gravel
       8
               place?
       9
                        Because they -- they had been putting
               stuff in the creek, and it was making it flood,
13:17:47
      10
               and he was trying to find out who was doing it.
      11
      12
                    Q. Okay.
                         MS. GEIGER: It was MB.
      13
                         MS. LEE: You --
      14
      15
                         MS. GEIGER: Sorry.
      16
                         MS. LEE: I mean, if we need to go off
      17
                    the record and you --
                         MR. WAIDE: No, we can do it later.
      18
               BY MS. LEE:
      19
                        Now, you and Mr. Keeton also had
13:18:05
      20
      21
               multiple dogs at the trailer, correct?
      22
                    Α.
                        Yes.
      23
                        How many dogs?
                    Q.
      24
                    Α.
                         Three.
      25
                    Q. All right. What kind of dogs were
```

	1	these?
	2	A. A lab and Rottweiler.
	3	Q. Okay. Were they inside the trailer on
	4	October 27, 2015?
	5	A. Yes.
	6	Q. And in the early morning hours of
	7	October 28, 2015?
	8	A. Yes.
	9	Q. Okay. All right. So your testimony
13:18:29	10	has been that you went to bed about 10:00 p.m.,
	11	correct, on October 27, 2015?
	12	A. Yes.
	13	Q. And Mr. Keeton, did he come to bed
	14	with you at that time?
	15	A. Yes.
	16	Q. All right. Talk me through, then, the
	17	next thing you remember in terms of what
	18	occurred with the police, following you going to
	19	bed.
13:18:56	20	A. Onliest thing I remember was they were
	21	ramming the door and hollering. And Ricky got
	22	up and went to the door because he thought
	23	somebody was breaking in, and that's when they
	24	started shooting.
	25	Q. Okay. All right. So you heard them

```
1
               ramming the door and hollering.
       2
                    A. (Nods head up and down.)
                    Q. Yes?
       3
                        Yeah.
       4
                    Α.
                        And when they were hollering, were
       5
                    Q.
       6
               they hollering Monroe SO or --
       7
                        I don't know.
                    Α.
       8
                        -- could you make it out?
                        I couldn't tell what they was doing.
       9
                    Α.
                        But they were hollering.
13:19:27
      10
                    Q.
                         They was hollering and ramming the
      11
                    Α.
      12
              door.
                        And these were the policemen
      13
                    0.
               hollering, not --
      14
                    A. I don't --
      15
      16
                        -- Mr. Keeton hollering.
                        No, it wasn't Ricky. No.
      17
                        Okay. And Mr. Keeton heard the
      18
                    Q.
               hollering and ramming, and he went to the door,
      19
               correct?
      20
13:19:37
                         MR. WAIDE: Excuse me. Excuse me.
      21
                         He -- I don't know if he --
      22
                    Α.
      23
                         MR. WAIDE: Object. She doesn't know
                    what he heard.
      24
      25
                    A. Yeah. I don't --
```

```
1
                         MR. WAIDE: Just let her answer for
       2
                    herself what happened. Just --
                    Α.
                         Yeah.
       3
                         MR. WAIDE: -- explain what happened.
       4
                         I don't know if he heard it. I mean,
       5
                    Α.
               I don't know what he heard.
       6
       7
               BY MS. LEE:
       8
                    Q. Okay. But you heard ramming and
       9
               hollering.
      10
                    Α.
                        Something, yeah.
13:19:51
                        Yes. Okay.
      11
                    Q.
                         So Mr. Keeton then -- did you witness
      12
              Mr. Keeton go to the door, picking up a pellet
      13
      14
               qun along the way?
      15
                    A. It was a pellet pistol.
      16
                        Okay. Pellet pistol. And I've seen a
                    Q.
               picture of the pellet pistol, and it looks just
      17
               like a handgun, doesn't it?
      18
      19
                    A. Yeah, it does.
                         And so Mr. Keeton took the handgun,
      20
13:20:11
               pellet pistol, to the front door, correct?
      2.1
                    A. Yes.
      22
                         Now, did you have a visual of him at
      23
               this time and where were you in terms of what
      24
      25
               you could see or not see?
```

	1	A. I was I was sitting up in the bed.
	2	Q. All right. Could you see Mr. Keeton?
	3	A. Yes.
	4	Q. And is the hollering and ramming
	5	continuing at this time?
	6	A. I don't I don't I don't
	7	remember. It was for a while, and then the guns
	8	started shooting.
	9	Q. Did you see the door swing open at any
13:20:39	10	time?
	11	A. Ricky opened the door.
	12	Q. All right. And he was standing there
	13	with his pellet pistol, correct?
	14	A. I don't know. I don't know where he
	15	where it was at. I don't know. I don't know
	16	well, he's left-handed, so the gun would be
	17	in his left hand. And he opens the door like
	18	this, so the pistol would be back here.
	19	Q. Uh-huh.
13:21:00	20	A. And I I don't know how anybody
	21	could have seen it.
	22	Q. You don't know how anybody could have
	23	seen it?
	24	A. No.
	1	

```
actually know what they saw because --
       1
       2
                    Α.
                         No.
                         -- you didn't --
       3
                     0.
                         I don't.
        4
                     Α.
                         -- have a visual?
       5
                     Q.
        6
                     Α.
                         No.
                         All right. After the door swings
       7
                     Q.
               open, what next?
       8
       9
                    Α.
                         Ricky closed the door.
                         All right. And then what next?
13:21:15
      10
                     Q.
      11
                         They started shooting.
                    Α.
      12
                         All right. Is it your testimony that
                     Q.
               Mr. Keeton did not fire a shot from the pellet
      13
      14
               pistol?
                         If he did I didn't hear it.
      15
                     Α.
                         Okay. It's possible, though, that he
      16
               could have fired a shot from the pellet pistol.
      17
                        Well, no, because the pellet was found
      18
      19
               at his feet.
                        Well, let me ask this again.
13:21:34
      20
                     Q.
      21
                     Α.
                         Okay.
                        Do you know one way or the other
      22
                     Q.
      23
               whether Mr. Keeton fired his pellet pistol at
               the officers?
      24
      25
                     Α.
                         No.
```

	1	Q. All right. You just saw the door open
	2	and then the door close.
	3	A. Yes.
	4	Q. Correct? All right. Now, tell me
	5	what you saw or heard next.
	6	A. I just heard the gun shooting.
	7	Q. Okay. You don't know if it was
	8	Mr. Keeton's gun or the officer's gun, do you?
	9	A. It was not Ricky's gun.
13:22:06	10	Q. How can you be sure?
	11	A. Because you can tell a pellet gun from
	12	a pistol.
	13	Q. Uh-huh. And where were you when you
	14	made this distinction between the pellet gun and
	15	the regular guns?
	16	A. I was setting on the bed.
	17	Q. Okay. Your testimony earlier was that
	18	you had gotten down on the floor. Is that not
	19	correct?
13:22:27	20	A. When the when they started shooting
	21	I did.
	22	Q. Okay. So now your testimony is you
	23	were down on the floor when the shooting
	24	occurred?
	25	A. Yes.

	1	Q. All right. When the shooting stopped,
	2	what did you do next?
	3	A. Nothing. I just stayed under the bed.
	4	Q. So you were under the bed?
	5	A. I was under the bed.
	6	Q. All right. Tell me at what point
	7	during this whole scenario you got under the
	8	bed?
	9	A. When the shooting started.
13:23:03	10	Q. Okay. Did Mr. Keeton make any
	11	statements to you at any time from the time you
	12	heard the hollering and ramming of the door
	13	until it was all over?
	14	A. Yeah. When they shot him he said,
	15	Wanda, they got me.
	16	Q. Okay. Did he did he make any
	17	statements to you that about the police
	18	coming on the property?
	19	A. (Shakes head side to side.)
13:23:31	20	Q. Is that a no?
	21	A. No.
	22	Q. He never said something to the effect
	23	of, I'm going to go show them?
	24	A. No.
	25	Q. Okay.

```
1
                    A. He didn't know anybody was even out
       2
               there.
       3
                        All right. How do you know what he
       4
              knew, Ms. --
                       Well, I don't really know, but he
       5
              didn't hear anything to start with, and the dogs
       6
       7
              didn't bark. If somebody's coming up, the dogs
       8
              will always bark; but they never barked.
       9
                    Q. Okay. But you earlier testified that
              you heard hollering and ramming, correct?
      10
13:24:02
                        Yeah, when they -- yeah. I did.
      11
                    Α.
                        Okay.
      12
                    Q.
                        I don't know what they --
      13
                    Α.
      14
                    0.
                        It's true --
      15
                    A. -- were saying.
                        -- though, you don't know what -- it's
      16
              true you don't know what Mr. Keeton heard or
      17
              didn't hear?
      18
      19
                    A. No. Not really.
                    Q. Okay. Did you have any conversations
13:24:14
      20
              with the sheriff, Cecil Cantrell, after the
      21
              incident occurred?
      22
      23
                    A. Yes.
                    Q. Do you recall what you told
      24
              Mr. Cantrell at that time?
      25
```

	1	A. He wanted to know how long we'd had
	2	the cameras, and I told him.
	3	Q. Uh-huh.
	4	A. And he got mad because I called him
	5	out on his his he said that that the
	6	boy didn't steal the vehicles. And two weeks
	7	later, he he caught the guy:
	8	Q. I'm confused. What are you talking
	9	about?
13:24:47	10	A. The boy that stole the vehicles out of
	11	the yard.
	12	Q. There was a boy who stole vehicles out
	13	of the yard?
	14	A. There was two boys a boy that stole
	15	two vehicles out of the yard. That's the reason
	16	we put the cameras up. And Cecil got mad
	17	because I called him out on it.
	18	Q. Okay.
	19	MR. WAIDE: Excuse me. Are you
13:25:05	20	A. Because he said that
	21	MR. WAIDE: Let me understand
	22	something.
	23	THE WITNESS: Okay.
	24	MR. WAIDE: I think she's talking
	25	about an earlier conversation rather than

41

```
1
                    that night. Are you talking about that
       2
                    night?
                        THE WITNESS: No, that night.
       3
       4
                        MR. WAIDE: Oh, you --
       5
                        MR. WITNESS: Yeah, that night.
                        MR. WAIDE: That night y'all talked
       6
       7
                    about it?
       8
                        THE WITNESS: Yeah.
                        MR. WAIDE: Okay.
       9
                        THE WITNESS: That night.
     10
13:25:14
                        MR. WAIDE: I'm sorry.
      11
              BY MS. LEE:
      12
                    Q. On a day-to-day basis, Wanda, how many
      13
      14
              visitors would you-all have out at the trailer?
                        I don't have a clue. I work. I go to
      15
              work at 6:00 o'clock, and I get home about 5:00
      16
      17
              o'clock in the afternoon. I don't know what he
              does during the day.
      18
                    Q. Okay. From 6:00 a.m. to 5:00 p.m.
      19
                    Α.
                        That's right.
13:25:33
      20
      21
                    Q.
                        Okay.
                        MS. LEE: Give us just a second. We
      22
                    may be close. Let me talk to Mr. Arnold
      23
                    and I'll be back. Go off the record.
      24
                         (Brief recess.)
      25
```

	1	BY MS.	LEI	Ε:
	2	,	Q.	I just have a couple more questions.
	3			Wanda, what is your sister's name you
	4	mentic	oned	earlier that you live with?
	5		Α.	Brenda Williams.
	6	(Q.	Do you have any other siblings?
	7	;	Α.	Yes.
	8	(Q.	And who are they?
	9	1	Α.	Mike Odom, David Odom, and Eddie Odom.
13:30:28	10		Q.	So is "STE-gull"? Am I saying that
	11	correc	ctly	?
	12		Α.	"STE-gall."
	13		Q.	Stegall. Is that a married name for
	14	you?		
	15		Α.	Yes. Yes.
	16	,	Q.	And when were you married?
	17		Α.	Don't ask me the dates because I
	18	couldr	n't f	tell you.
	19		Q.	Prior to your relationship with
13:30:44	20	Mr. Ke	eetoi	n?
	21		Α.	But I was married for about ten years
	22	before	e tha	at.
	23		Q.	And that was to Mr. Stegall.
	24		Α.	Yeah.
	25		Q.	How did you meet Ricky?

	1	A. I've known Ricky just about all my
	2	life.
	3	Q. Okay. You gave a couple of statements
	4	to various individuals in law enforcement
	5	following the October 28th, 2015, incident,
	6	correct?
	7	A. Yes.
	8	Q. Do you recall giving those
	9	A. I guess.
13:31:23	10	Q statements?
	11	A. No.
	12	Q. Okay. Is there any reason that you
	13	would have lied in the course of giving those
	14	statements?
	15	A. No. I probably should have because
	16	Cecil said, If you'll help us, we'll help you.
	17	Okay. So he asked me had we smoked that night,
	18	and I said yes, and I should have said no.
	19	Q. But the truth was you had smoked
13:31:44	20	crystal meth?
	21	A. The truth was I had.
	22	Q. All right. I think that's all the
	23	questions I have. All right. Thank you, Wanda.
	24	
	25	

	1	EXAMINATION
	2	BY MR. WAIDE:
	3	Q. All right. Wanda, I'm going to have
	4	several questions based
	5	A. Okay.
	6	Q on what she's asked you. All I
	7	want to ask you about now is on that night after
	8	Ricky was killed, just tell me everything you
	9	can remember Cecil saying and you saying. Just
13:32:06	10	I think you've testified about several
	11	different things. But just best you can, what
	12	all did he say and what all did you say after
	13	you talked first of all, were you in
	14	handcuffs when you talked to him? Had they
	15	arrested
	16	MS. LEE: Let me
	17	A. Yes, I think so.
	18	MS. LEE: I'm going to object to the
	19	form of the question
13:32:19	20	A. I think so.
	21	MS. LEE: but not that last
	22	question. That's fine.
	23	A. I think I was. I think they put
	24	handcuffs on me when I was in the trailer
	25	BY MR. WAIDE:

	1	Q. Okay.
	2	A. When they came in.
	3	Q. All right. How did it come about that
	4	you started talking to Cecil? Did he approach
	5	you or did you approach him?
	6	A. No, he approached me.
	7	Q. And where were you when he approached
	8	you?
	9	A. Standing outside under the shed.
13:32:38	10	Q. Did you have handcuffs on or not have
	11	any?
	12	A. I think I did.
	13	Q. All right. And he approached you, and
	14	just try to tell me everything he said,
	15	everything you said.
	16	MS. LEE: Object to the form but go
	17	ahead.
	18	A. I don't really remember all of it. I
	19	know he asked me that. And then that's when I
13:32:52	20	told him he asked about the cameras and
	21	BY MR. WAIDE:
	22	Q. What did he ask about the cameras?
	23	A. He wanted to know how long we'd had
	24	the cameras. And I told him a couple of years,
	25	think, that we put them up when the boy stole

```
1
               the vehicles, and I had called him about it,
       2
               and --
       3
                         Was Ricky present when you called him?
                         Yes. And he -- he didn't believe it,
        4
                     Α.
       5
               I quess. And then two weeks later, he caught
       6
               the boy stealing somebody else's vehicle.
       7
                         So did y'all have that conversation
               that night about you calling him about the
       8
       9
               cameras?
                    Α.
                         Yes.
      10
13:33:20
      11
                         All right. Do you remember, did some
      12
               officer -- it might not have been Cecil.
      13
               some officer or Cecil or anybody ask you about
               growing pot out there or growing marijuana?
      14
                         Yes, but I don't know who it was:
      15
                         Somebody asked you?
      16
                         Yeah. I don't -- I don't know.
      17
               couldn't tell you who it was.
      18
      19
                    0.
                         All right.
                         And then there was one -- the first
      20
13:33:40
               one that came in the trailer, I don't know who
      21
               it was, he said, They've got video cameras.
      22
               They got video cameras.
      23
                         That was the first thing he said when
      24
      25
               he come in.
```

	1	Q. One of the officers?
	2	A. One of the officers.
	3	Q. Can you describe the officer that said
	4	that?
	5	A. He was tall. It was the one that
	6	arrested me. I don't know who he was.
	7	Q. You don't know what his name was?
	8	A. Huh-uh, because I don't really I
	9	don't really know them.
13:34:05	10	Q. All right. What just tell me
	11	everything that you can remember telling Sheriff
	12	Cantrell that night. What all can you
	13	A. That was
	14	MS. LEE: Object to the form.
	15	A. That was really about all that I
	16	remember. And then they ended up taking me to
	17	jail then.
	18	BY MR. WAIDE:
	19	Q. Well, you earlier said, when you were
13:34:30	20	being questioned by Counsel, that Cecil asked if
	21	y'all had been smoking
	22	A. Yes.
	23	Q. All right.
	24	A. That night.
	25	Q. Do you know, how did Cecil know that

```
1
               y'all smoked meth? Do you know?
       2
                         I don't -- I don't have a clue.
       3
               don't know.
                        You don't know whether he knew that --
       4
                    0.
       5
               whether Cecil knew Ricky?
                         Yeah. Cecil knew Ricky.
       6
       7
                         MS. LEE: I'm going to object to the
       8
                    form.
               BY MR. WAIDE:
       9
                         How do you know that?
13:34:54 10
                        Because Cecil had bought a horse
      11
               trailer from Ricky, and then Ricky -- and I
      12
               don't know how true this is. Ricky and Cecil
      13
      14
               Cantrell was bringing pot in off the river back
               when Cecil was judge.
      15
                         MS. LEE: Objection. Move to
      16
                    strike --
      17
                         MR. WAIDE: All right.
      18
      19
                         MS. LEE: -- the statement.
               BY MR. WAIDE:
      20
13:35:11
                        Well, anyway, let's not --
      21
                    O.
      22
                    Α.
                        Yeah.
                         -- get into that. But you say Ricky
      23
               -- he bought a horse trailer from --
      24
      25
                    Α.
                         Yeah. From Ricky.
```

	1	Q Ricky?
	2	A. Yeah.
	3	Q. Okay. Now, let me go back and ask you
	4	some about the you've already been
	5	questioned in a deposition, correct?
	6	A. Uh-huh.
	7	Q. And do you remember several MBI
	8	officers have talked to you from time to time,
	9	you remember that, and taken your statement?
13:35:33	10	A. Kenny Bailey talked to me first. And
	11	then I don't know. Somebody didn't want
	12	Kenny Bailey, and so Cory come in.
	13	Q. Cory. I know who you're talking
	14	about.
	15	MR. LUCIANO: Burrows.
	16	MR. WAIDE: Burrows. Yeah.
	17	BY MR. WAIDE:
	18	Q. All right. So you've been asked about
	19	this several times, about what happened that
13:35:53	20	night; so I know this is repetitive. But if you
	21	would, you said y'all went to bed. Did you go
	22	to sleep?
	23	A. Yes.
	24	Q. Did you go to sleep?
	25	A. Yes.

	1	Q. What do you do you remember how
	2	how is it that you woke up? Do you remember
	3	Ricky saying anything to you or
	4	A. He woke me up and he said he said,
	5	I heard something outside. And then that
	6	that's when they started ramming the door.
	7	Q. At about the same time?
	8	A. Yeah. About the same time he said it
	9	and got up.
13:36:17	10	Q. I see. Other than saying that he
	11	heard something outside, did he say anything
	12	else about what was going on outside?
	13	A. No.
	14	Q. Other than saying he heard something?
	15	A. No.
	16	Q. All right. Now, Counsel asked you
	17	this question. I think she asked the question
	18	was there audio so that you could hear from
	19	inside you could hear what was going on outside.
13:36:37	20	Was that monitor rigged to where you could do
	21	that?
	22	A. I guess. But if you was asleep, you
	23	couldn't hear it. I mean, I we didn't know
	24	have a clue that anybody was outside.
	25	Q. I see. But he said he heard something

```
1
               outside?
       2
                         He heard something, but --
                    Q. Did he say anything else, to your
       3
               knowledge, before he was shot? Did he say
       4
               anything else?
       5
       6
                    Α.
                        No.
       7
                        Did not.
                    Q.
       8
                    Α.
                         No.
       9
                         Could you see whether -- could you
                    Q.
               tell whether he put any clothes on before he
13:37:00
      10
               went to the door?
      11
                         I don't know what he had on. I don't
      12
               even know what I had on.
      13
                    O. All right. Counsel asked you a bunch
      14
               of questions about your use of meth and Ricky's
      15
      16
               use of meth.
      17
                    Α.
                        Uh-huh.
                        And you described how y'all did that.
      18
                    Q.
                         First of all, what -- you've seen
      19
               Ricky do it a couple of times a week, you said?
13:37:17
      20
      21
                    Α.
                         Yeah.
                    Q. What effect did smoking meth have on
      22
               Ricky? How did --
      23
                         MS. LEE: Object to the form.
      24
      25
                         I just give you a little bit of
                    Α.
```

	1	energy, but
	2	BY MR. WAIDE:
	3	Q. Did it alter his personality in any
	4	way?
	5	A. No. No.
	6	Q. But you went to you earlier
	7	testified that you went to sleep a couple of
	8	hours after you smoked?
	9	A. Yeah.
13:37:39	10	Q. Did he go to bed with you also?
	11	A. We both went yeah. We both went to
	12	bed at the same time.
	13	Q. Was that consistent with your previous
	14	practice? Could y'all smoke it and go to bed?
	15	A. Yeah, sometimes we would because I had
	16	I have to get up at 4:00 o'clock every
	17	morning and go to work.
	18	Q. What effect does it have on you when
	19	you smoke meth? How does it affect you?
13:37:58	20	A. Not a whole lot. Just gives me a
	21	little energy, and if I I guess if I sat
	22	there and smoke a lot, it would do more; but we
	23	didn't do that because I had to work.
	24	Q. Did you ever see Ricky smoke a lot of
	25	meth?

	1	A. Unless he done in the daytime. No, I
	2	hadn't seen him.
	3	Q. Did you ever see Ricky get angry or
	4	act irrational after he smoked?
	5	A. No. Now, he got mad when the cars
	6	come up gone. But other than that, Ricky was
	7	the same ole Ricky every day.
	8	Q. What do you mean by "the same ole
	9	Ricky every day"?
13:38:30	10	A. Just laughing and cutting up, and he
	11	just I mean, you didn't hardly see Ricky ever
	12	mad.
	13	Q. How long had it been that the cars
	14	were gone? When was that?
	15	A. It had been about two years before.
	16	Q. Is that when you called Sheriff
	17	Cantrell?
	18	A. Yeah. Yes.
	19	Q. All right. Now, Counsel asked you
13:38:50	20	about Parker.
	21	A. Uh-huh.
	22	Q. Was and you said Parker was doing
	23	some work there. What was he doing?
	24	A. He had been working on the lean-to. I
	25	guess that's what you call it.

	1	Q. Lean-to?
	2	A. Yeah. He'd been working on it and
	3	Q. Doing construction work?
	4	A. Yeah. And then he'd put some some
	5	stuff on top of our trailer to, you know, seal
	6	it off. He done that.
	7	Q. All right. How often had he been
	8	there, would you say? How many times had he
	9	been there?
13:39:17	10	A. Oh, probably about four. About four
	11	times.
	12	Q. All right. When he came up that
	13	night, you said he did not smoke any meth with
	14	y'all?
	15	A. Not no, not in the house. We sat
	16	there and eat he eat supper with us, and then
	17	him and Ricky went out to the shed. And they
	18	stayed out there for a little while, and Parker
	19	left, and then Ricky come back in.
13:39:36	20	Q. All right. When y'all smoked the dope
	21	on previous occasions, where was it kept? Where
	22	would he get
	23	A. In the shed.
	24	Q. In the shed?
	25	A. (Nods head up and down.)

```
When you told -- didn't you tell --
       1
                     0.
       2
               didn't the -- didn't you tell the -- did you or
       3
               did you not tell some of the officers that there
               was a green ammo can or something that might
        4
       5
               have drugs in it or something to that --
                         I told them there was a green can,
        6
                    Α.
               that I didn't know what was in it.
       7
                         I see. Was it in the trailer?
       8
                     0.
       9
                         It was that night.
                         Why was it in the trailer that night,
      10
13:40:06
       11
               or do you know?
      12
                         I don't know. I don't know why.
                         Where was it normally kept?
      13
                     0.
                         In the shed.
      14
                     Α.
      15
                         In the shed?
                     Q.
                         Did -- well, strike that.
      16
                         Have you ever -- have you been -- you
       17
       18
               had a previous conviction.
                     Α.
                         Yes.
       19
                         And you've -- you've testified that
      20
13:40:56
       21
               you smoked meth. Have you ever observed it have
               an effect on people, keeping them up at night?
       22
       23
               Have you ever seen --
                         Yeah, I --
       24
                     Α.
                         MS. LEE: Object to the form.
       25
```

```
1
                    A. -- I've seen people do that and stay
       2
               up all night, and some steal and do everything.
       3
               BY MR. WAIDE:
       4
                    Q. You said some people do that?
                        Yeah, I've -- I have.
       5
                        All right. From your observations,
       6
               does it have different effects on different
       7
       8
               people?
       9
                    Α.
                        Yes.
                         MS. LEE: Object to the form.
13:41:23
      10
                         Yes. It does.
      11
                    Α.
                         MR. WAIDE: Okay. All right. Let me
      12
                    go out with Robbie and see I've got
      13
                    anything else. Oh, I know what I need to
      14
      15
                    ask you.
      16
               BY MR. WAIDE:
                    Q. Let me forget about the cameras
      17
               because it's hard for me to understand. We've
      18
               got cameras here and cameras there, and I don't
      19
               know what --
      20
13:41:47
      21
                    A. Yeah.
      22
                    Q.
                        -- we're talking about.
                         But here's what I'd like to know is
      23
               about what you could see from inside the house.
      24
               You've mentioned between the daytime to the
      25
```

```
1
               nighttime. And there was apparently a monitor.
       2
               First of all, where was the monitor, like a
       3
               screen that you looked at? Is that what you're
               talking about, a monitor?
       4
                        Yeah. Yeah, like a TV.
       5
                    Α.
       6
                        Like a TV. All right.
                    Q.
       7
                    Α.
                        Yeah.
       8
                    Ο.
                         How big was it?
                         It was about that tall (indicating).
       9
                    Α.
               Just a small one.
      10
13:42:10
                         Do you know -- it's a small one?
      11
                    Q.
      12
                         MS. LEE: Let the record reflect the
                    witness is indicating about a foot tall and
      13
      14
                    a foot wide.
      15
                    A. Oh, okay.
               BY MR. WAIDE:
      16
                        Would that be about right?
      17
                    0.
                    Α.
                         About right.
      18
                         All right. And where -- if you're in
      19
                    Q.
               the bed, can you see the monitor from the bed?
      20
13:42:21
      21
                    Α.
                        Yes.
                        You can?
      22
                    Q.
                        Uh-huh. Yes.
      23
                    Α.
                         All right. And what does the -- what
      24
               are you looking out on? What area are you
      25
```

```
1
               looking out on when you -- when the monitor's
               there?
       2
       3
                         Like, toward the gate.
       4
                    0.
                         Toward the gate?
       5
                         Uh-huh.
                    Α.
                         All right. Assuming there are no
       6
                    Q.
       7
               lights out there -- well, first of all, are
               there any streetlights or anything to light up
       8
       9
               that area?
                         Maybe on the other street but nothing
13:42:42
      10
      11
               right there coming in the gate.
                    O. Let's talk about from the gate. From
      12
               the gate up until the trailer. First of all,
      13
               how far is that from the gate to the trailer?
      14
                    A. I don't know. I don't have a clue.
      15
                     Q. All right. From the gate up to the
      16
               trailer, at night, can you see anything between
      17
               the trailer and the gate at night?
      18
      19
                    Α.
                         No.
                         If there's no lights?
      20
                     Ο.
13:43:02
      21
                         No.
                     Α.
      22
                         Cannot?
                     Q.
      23
                     Α.
                        Cannot.
      24
                         All right.
                     Q.
                         At any time did Ricky ever tell you
      25
```

```
1
               that he saw anything before they came up there?
       2
                         MS. LEE: Object to the form.
        3
                     Α.
                         No.
               BY MR. WAIDE:
        4
        5
                     Q.
                         In the daytime can you -- on the
               monitor, can you see -- in the daytime can you
        6
       7
               see down at the gate?
                         Yes. You can see it in the --
       8
                    Α.
                         Can you see clearly in the daytime?
       9
      10
                         Yes, sir.
13:43:43
                         Do you know who Eric Sloan is? Do you
      11
                     Ο.
               know which one he is?
      12
      13
                    Α.
                         No.
                         Other than Cecil, did you talk to
      14
               anybody, any other officer that night or to any
      15
               other officer that night?
      16
                                Spencer Woods.
                     Α.
                         Yeah.
      17
      18
                         Spencer.
                     Q.
                         When I come out of the trailer, he had
      19
                     Α.
               stopped me; and he said, I didn't know you was
      20
13:44:12
      21
               in there. And....
      22
                     0.
                        Is that the only one?
                         Yeah, that I remember. Well, one of
      23
               them give me his jacket. I don't know who it
      24
      25
               was.
```

	1	Q. One of the officers gave you his
	2	jacket?
	3	A. Yeah, because I was cold.
	4	Q. Concerning what happened that night,
	5	then, did you talk to anybody? Did you talk to
	6	anybody about what happened that night other
	7	than the I mean other than when the MBI
	8	questioned you?
	9	A. Just my sister, when I met her at the
13:44:38	10	jail.
	11	Q. And you went to they took you to
	12	jail right from there?
	13	A. Yes.
	14	Q. So that would have been you
	15	okay. Anybody tell you why they were charging
	16	you?
	17	A. Yeah. One guy, he came to the jail
	18	later on that that morning, I think. And I
	19	asked him why was I being charged; and he said,
13:45:11	20	I have to charge you with something.
	21	Q. Was that an officer?
	22	A. That was Chris Smith
	23	Q. Chris Smith? Okay.
	24	MR. WAIDE: Okay. That's all I have.
	25	

	1	FURTHER EXAMINATION
	2	BY MS. LEE:
	3	Q. Wanda, you testified earlier that
	4	there were other people that you've witnessed
	5	smoke crystal meth and that there were varying
	6	degrees of effect that the drug had on them,
	7	correct?
	8	A. Yeah. I hadn't seen them smoke it,
	9	but I I figured they had smoked it because of
13:45:41	10	the way they were acting.
	11	Q. Okay.
	12	A. But I hadn't seen them do it.
	13	Q. So you've never actually done a study
	14	of crystal meth smokers to see
	15	A. No.
	16	Q what their reaction is
	17	A. No. Not really.
	18	Q of that drug on them.
	19	A. No, not really.
13:45:54	20	Q. Okay. You've just witnessed people
	21	who you believed to have smoked crystal meth and
	22	their behavior.
	23	A. Yeah. By the way they're acting.
	24	Q. And who were these people?
	25	A. What do you mean?

	1	Q. Who were they? Who were these people
	2	that you've seen
	3	A. People that I worked with that you
	4	could tell that well, there was one girl you
	5	could tell she'd been doing it because she was
	6	jittery and just you could tell.
	7	Q. Because the normal effect of crystal
	8	meth is it does give you energy, correct?
	9	A. Yes.
13:46:19	10	Q. And does make you jittery, correct?
	11	A. No, not really.
	12	Q. Does make you stay up all night,
	13	correct?
	14	A. Sometimes.
	15	Q. Okay.
	16	A. Just according to if you want to stay
	17	up or not.
	18	Q. All right. Who else have you ever
	19	witnessed smoke crystal meth besides Ricky and
13:46:35	20	obviously you know that yourself did it?
	21	A. What do you mean?
	22	Q. Who else have you seen smoke crystal
	23	meth?
	24	A. Well, just people that I worked with.
	25	Q. Who are they?

```
1
                        Well, I'm not going to give any names,
       2
               now.
                         MR. WAIDE: Yeah, I don't think
       3
       4
                    that's --
       5
                    A. No, that's --
                         MR. WAIDE: I don't think it's
       6
                    appropriate for her to be --
       7
                    A. That ain't none of --
       8
                      MR. WAIDE: -- calling out anybody
       9
      10
                    else anyway.
13:46:55
                    A. -- nobody's business.
      11
                         MS. LEE: Well, she's testified about
      12
                    the effect of crystal --
      13
      14
                         MR. WAIDE: Well --
                         MS. LEE: -- meth on other people, and
      15
                    I'm asking her who these people are.
      16
                         I have seen it. The girl that I
      17
               worked with, I had seen her doing it; but as far
      18
      19
               as I know, she's quit.
               BY MS. LEE:
      20
13:47:06
      21
                    Q. You've seen her actually smoke it?
                    A. No, I didn't see her smoke it. I just
      22
               seen her act -- the way she was acting.
      23
      24
                    Q.
                        Okay.
                    A. I just assumed she'd smoked it.
      25
```

	1	Q. Now, Mr. Waide asked you about the
	2	cameras at your you and Ricky's trailer.
	3	A. Yes.
	4	Q. And I want to ask you about the camera
	5	that was facing the backdoor.
	6	A. Yes.
	7	Q. It's true, isn't it, that you-all had
	8	a light pole that was illuminating or lighting
	9	up the backyard, correct?
13:47:32	10	A. Yes.
	11	Q. So there was light in the backyard,
	12	correct?
	13	A. Well, I don't know if it was on or
	14	not.
	15	Q. Well, but you'll agree with me that
	16	you did have a light pole in the backyard that
	17	would normally illuminate the backyard?
	18	A. Yeah, if it was on. I don't even know
	19	if it was on. I don't have a clue.
13:47:47	20	MS. LEE: Okay. All right. Thank
	21	you. That's all I have.
	22	MR. WAIDE: That's all.
	23	THE WITNESS: Okay.
	24	MR. LUCIANO: I don't know if Jim
	25	wants to go over this with you or not.

1 She is taking everything down and 2 putting everything on the record. You have an opportunity to read over it and figure 3 out if she did her job or --4 MR. WAIDE: Yeah. She better not 5 waive that, yeah. I don't waive that. She 6 7 -- she's going to need to read and sign. THE WITNESS: Yeah. 8 MR. LUCIANO: That's fine. 9 (Brief recess.) 10 MR. WAIDE: Let's go back on the 11 12 record. Let's reopen this deposition. 13 FURTHER EXAMINATION 14 15 BY MR. WAIDE: After we went off the record, you made 16 a comment about Cecil lying. What -- what is 17 18 your -- what are you talking about? MS. LEE: And, for the record, I'm 19 20 going to object to reopening the deposition; but, Ms. Wanda, you can say --21 22 Well, the reason I was charged with 23 drug trafficking, because Cecil had to put on TV that he had arrested me that day -- this was in 24 25 2016 -- that he had arrested me that day and got

```
drugs and a bunch of money. And he lied, and
 1
 2
        I've got proof of it.
                  And he said it was bringing a closure
 3
        to the case, talking about Ricky's case.
 4
 5
        BY MR. WAIDE:
              Q. Is that what you wanted to tell us
 6
 7
        about?
              A. That's what I wanted to -- I wanted
 8
 9
        her to know.
10
              Q.
                  Okay.
                  MS. LEE: Thank you.
11
                  (Deposition concluded at 1:52 p.m.)
12
13
14
15
16
17
18
19
20
21
22
23
24
25
```

```
1
                      CERTIFICATE
        STATE OF MISSISSIPPI )
 3
        COUNTY OF MONROE
             ORAL DEPOSITION OF WANDA STEGALL
 4
5
                I, Gena Mattison Glenn, CSR 1568, a
        Notary Public within and for the aforesaid
 6
        county and state, duly commissioned and acting,
7
        hereby certify that the foregoing proceedings
 8
        were taken before me at the time and place set
 9
        forth above; that the statements were written by
10
        me in machine shorthand; that the statements
11
        were thereafter transcribed by me, or under my
12
13
        direct supervision, by means of computer-aided
14
        transcription, constituting a true and correct
15
        transcription of the proceedings; and that the
        witness was by me duly sworn to testify to the
16
        truth and nothing but the truth in this cause.
17
               I further certify that I am not a
18
        relative or employee of any of the parties, or
19
        of counsel, nor am I financially or otherwise
20
        interested in the outcome of this action.
21
22
               Witness my hand and seal on this 10th day
23
        of March, 2022.
24
                                     CSR 1568
        My Commission Expires:
        July 19, 2023
                                     Notary Public
25
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1	IN THE UNITED STATES DISTRICT COURT
2	FOR THE NORTHERN DISTRICT OF MISSISSIPPI ABERDEEN DIVISION
3	
4	ROBBIE KEETON GEIGER, as Administratrix Of the Estate of Ricky Keith Keeton, Deceased; DELISHA KEETON MOONEY, and
5	MEGAN ARCHER PLAINTIFFS
6	VS. CAUSE NO. 1:16-CV95-SA-DAS
7	MONROE COUNTY, MISSISSIPPI
8	and ERIC SLOAN DEFENDANTS
9	
10	CERTIFICATE
11	I, Wanda Stegall, have read the foregoing pages, 1-67, of the transcript of my deposition
12	given on March 1, 2021, and it is true, correct and complete to the best of my knowledge,
13	recollection and belief except for the list of corrections, if any, attached on a separate
1.2	sheet herewith. Witness my hand, this the
14	day of, 2022.
14 15	, day of, 2022.
15	, day of, 2022.
15 16 17	, day of, 2022.
15 16	, 2022.
15 16 17 18	day of, 2022. Wanda Stegall CERTIFICATE
15 16 17 18 19	
15 16 17 18	
15 16 17 18 19 20 21	day of, 2022. Wanda Stegall CERTIFICATE Subscribed and sworn to before me, this the, 2022. Notary Public in and for the
15 16 17 18 19 20 21	day of, 2022. Wanda Stegall CERTIFICATE Subscribed and sworn to before me, this the, 2022.

1	GLENN-HENRY REPORTING P.O. BOX 492	
2	AMORY, MISSISSIPPI 38821-0492	
3	CORRECTION LIST	
4	Keeton vs. Monroe County, MS, et al No. 1:16-CV95-SA-DAS	
5	CAPTION	
6	March 1, 2022 Wanda Stegall	
7	DATE OF DEPOSITION DEPONENT'S NAME	
9	PAGE LINE CORRECTION REASON	
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12		
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18		
19		
20		
21		
22		
23		
24		
25	Wanda Stegall	

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GLENN-HENRY REPORTING
1
                           P.O. BOX 492
 2
                       AMORY, MS 38821-0492
 3
        March 10, 2022
 4
        Honorable Jim D. Waide
5
        Waide & Associates
 6
        P.O. Box 1357
        Tupelo, MS
                    38802-1357
7
             Keeton vs. Monroe County, MS, et al
             No. 1:16-CV95-SA-DAS
8
9
        Dear Ms. Lee:
        Enclosed is your copy of the transcript of the
10
        deposition of Wanda Stegall, taken in the above
        entitled and numbered cause on March 1, 2022.
11
12
        Also enclosed is the signature page and
        corrections page to be used by the deponent when
        reading your copy of the deposition.
13
        After the signature page and corrections page
14
        have been completed by the deponent, and
        properly signed by a Notary, please return these
15
        forms to Mr. Jim D. Waide, so that they may be
        attached to the original transcript.
16
        If the completed signature page and corrections
17
        sheet have not been received by Mr. Jim D. Waide
        on or before April 15, 2022, (30 days), reading
18
        and signing will be waived.
19
        Thank you for your cooperation.
20
        Sincerely,
21
22
        Gena Mattison Glenn
23
        CSR 1568
2.4
        Enclosures
25
        cc: Mr. Jamie F. Lee
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